



September 30, 2011

Ms. Marlene Dortch,
Office of the Secretary
Federal Communications Commission
455 12th Street SW
Washington, DC 20554

Re: PCIA Comments - WC Docket No. 11-59

Dear Ms. Dortch:

The City of Savannah, Georgia appreciates this opportunity to respond to the unfounded allegations made by the PCIA to the Federal Communications Commission.

The PCIA complaint, Exhibit B, Section IV, identifies Savannah among "jurisdictions that have codified blanket bans across certain zoning districts" prohibiting Wireless Telecommunications Facilities. This is incorrect. The Savannah Wireless Telecommunications Facilities Ordinance (Section 6.1) includes the following language: "WTFs are allowed in all zoning districts, subject to the limitations set forth herein." The limitations deal with standards not prohibiting the location of WTFs in a particular zoning district and the standards in no way constitute a ban on WTFs.

Also, Exhibit B, Section V of the PCIA complaint identifies Savannah's WTF consultant, (CityScape), as one of a group of "Problematic Consultants," whose professional behavior is allegedly "obstructionist" and "problematic." However, we have found our CityScape representative to be both expeditious and objective in reviewing WTF cases (usually completing their review within two weeks). The CityScape consultant also is courteous and professional in his dealings with wireless providers and tower companies and an important resource to us.

The PCIA allegations against the City of Savannah are both ill-researched and baseless.

Sincerely,

A handwritten signature in blue ink that reads "Brian Gore".

Brian Gore
Director of Council and Legislative Affairs